REMARKS

This Amendment, submitted in response to the Office Action dated April 14, 2004, is

believed to be fully responsive to each point of rejection raised therein. Accordingly, favorable

reconsideration on the merits is respectfully requested.

Preliminary Matters

Applicant respectfully requests that the Examiner initial the PTO Form 1449 filed April

13, 2004.

Claim Rejections

Claims 1-45 are pending in the present application. Claims 3-5, 12, 18-20, 27, 33-35, 42

have been objected to but would be allowed if rewritten in independent form. Claims 1-2, 6-8,

13-17, 21-26, 28-32, 36-41, 43-45 have been rejected under 35 U.S.C. § 102(a) as being

anticipated by U.S. Patent No. 6,006,242 to Poole *et al.* ("Poole"). Applicant submits the

following in traversal of the rejection.

Claims 1, 16 and 31

The Examiner asserts that Poole teaches "for each level of the hierarchy, defining a target

location for storing entities of that level and a target location for storing inheritance information

for entities of that level" as recited in claim 1. The Examiner cites Fig. 1, items 32, 44, 46 and

48 in support.

At a step 32, Poole discloses that a document developer initiates a document production

session by defining the requirements of the document. Item 44 is a document constructed using

resolved and validated components A, B, C and N in accordance with a first document structure

and format style. Documents 46 and 48 are also constructed using components A, B, C, and N to

produce documents having differing structures and format styles. See col. 5, lines 1-34.

It appears that the Examiner cites components A, B, C and N as a plurality of

hierarchically related content entities. However, there is no indication that components A, B, C

and N are stored in a hierarchy. In particular, components A, B, C and N appear to be stored in a

Knowledge Base. Documents, document components, document type definitions catalogs, rules,

lines and other information needed to construct any number of documents and form types are

stored in the Knowledge Base. See col. 6, lines 17-28. However, there is no teaching or

suggestion that the components are hierarchically related as opposed to being generally collected

in the Knowledge Base.

It appears that the Examiner cites documents 44, 46 and 48 as "defining a target location

for storing entities of that level." However, claim 1 further recites "defining a target location for

storing **inheritance** information for the entities of that level. Poole neither teaches nor suggests

that inheritance information is stored in documents 44, 46, and 48. In particular, it is respectfully

submitted there is no need to store inheritance information since documents 44, 46 and 48 are

independent documents created based on a particular user's needs.

Claim 1 further recites "receiving as input the hierarchically related entities and the

information specifying their hierarchical relationship." It appears the Examiner cites an entity

reference which is associated with constituent portions of a document (see step 34, col. 5, lines

7-9) for teaching the claimed information specifying the hierarchical relationship of the
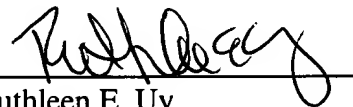
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hierarchically related entities. An entity reference is selected by a developer. An entity

reference resolution process ensures that all business, legal, and governmental requirements

applicable to a particular entity reference are duly satisfied. Col. 5, lines 15-17. However, there

is no teaching or suggestion in Poole that an entity reference **specifies the hierarchical**

relationship of hierarchically related entities.

For at least the above reasons, claims 1, 16 and 31 and their dependent claims should be

deemed patentable.

In view of the above, reconsideration and allowance of this application are now believed

to be in order, and such actions are hereby solicited. If any points remain in issue which the

Examiner feels may be best resolved through a personal or telephone interview, the Examiner is

kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue

Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any

overpayments to said Deposit Account.

Respectfully submitted,

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